

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUPAN CHAKMA, SULOY TRIPORA, TAPAN
KANTI TANCHANGYA, TIYANIT KAEWPAN,
and PRAMITA CHAKMA, on behalf of themselves
and others similarly situated

Plaintiffs,

v.

23-cv-08704 (KPF)

SUSHI KATSUEI, INC. d/b/a SUSHI KATSUEI
PARK SLOPE, ROYAL KATSUEI, INC. d/b/a
SUSHI KATSUEI WEST VILLAGE, AYE AYE
SWE, and AUNG KO WIN,

Defendants.

**IF YOU ARE OR WERE EMPLOYED AS A FOOD-SERVICE EMPLOYEE AT THE
SUSHI KATSUEI RESTAURANTS IN BROOKLYN OR MANHATTAN AT ANY TIME
ON OR AFTER SEPTEMBER 1, 2017, PLEASE READ THIS NOTICE.**

- Plaintiffs Rupan Chakma, Suloy Tripora, Tapan Kanti Tanchangya, Tiyanit Kaewpan, and Pramita Chakma have brought a lawsuit against Sushi Katsuei, Inc., Royal Katsuei, Inc., Aye Aye Swe, and Aung Ko Win (collectively, “Defendants”). The lawsuit alleges, among other things, that the Sushi Katsuei restaurants in Brooklyn and Manhattan (the “Restaurants”) illegally paid food-service employees who were not sushi chefs (“Servers”) pursuant to a tip credit, illegally paid Servers on a biweekly basis, and failed to provide Servers with certain wage notices and wage statements required under New York law. The lawsuit also alleges that the Sushi Katsuei restaurant in Brooklyn retained a portion of Servers’ tips and unlawfully included a manager in the restaurant’s tip pool.
- Defendants deny that Plaintiffs’ claims have merit and have asserted various defenses against those claims.
- The Court has allowed the lawsuit to proceed as a class action under the New York Labor Law. The class consists of all Servers who worked at either of the Restaurants at any time between September 1, 2017 and February 7, 2025. A subclass consists of all Servers who worked the Sushi Katsuei restaurant in Brooklyn at any time between September 1, 2017 and February 7, 2025, and who participated in the tip-pool. In a class action lawsuit, one or more people called the “Class Representative” sue on behalf of other people who have similar claims, called the “Class.” In this case, the Class Representatives are Named Plaintiffs Rupan Chakma, Suloy Tripora, Tapan Kanti Tanchangya, Tiyanit Kaewpan, and Pramita Chakma. Class members are automatically included in the case unless they choose to exclude themselves, in writing, from the Class.

- The Honorable Katherine Polk Failla, United States District Court Judge for the Southern District of New York, is overseeing this lawsuit. This class action lawsuit is known as *Chakma v. Sushi Katsuei, Inc.*, Case No. 23 CV 8704.
- This Notice is not an expression by the Court of any opinion as to the merits of any claims or defenses by either party to this lawsuit.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

Make sure to read this section carefully to understand your options.

1. REMAIN IN THE LAWSUIT

If you do nothing in response to this Notice, you will remain a member of the Class. This may allow you to receive money or other benefits that may come from a trial or settlement of this class action lawsuit.

By remaining a member of the Class, you give up the right to separately bring a lawsuit against Defendants for unpaid wages under the New York Labor Law. You will be legally bound by the orders and judgments that the Court enters regarding the Class claims.

If you remain in this lawsuit and the Class Representatives succeed in proving the claims against Defendants, you will be notified about how to receive your share of the money.

2. ASK TO BE EXCLUDED FROM THE LAWSUIT

If you ask to be excluded from this class action lawsuit, you will retain the right to sue Defendants separately.

If you are excluded, you will not be entitled to a share in any money that the Class may obtain from Defendants from either a trial or a settlement in this lawsuit.

If you wish to request exclusion from the Class, you must write to class counsel on or before July 14, 2025 and request to be excluded:

Josef Nussbaum, Esq.
Joseph & Kirschenbaum LLP
32 Broadway, Suite 601
New York, NY 10004

The exclusion request must be postmarked by July 14, 2025.

3. THE LAWYERS REPRESENTING THE CLASS

The law firm Joseph & Kirschenbaum LLP is representing you and all Class Members and has been designated “Class Counsel” in this lawsuit. Accordingly, if you choose to remain in the Class, you do not need to hire your own attorney because Class Counsel will represent you and all other Class Members. Nevertheless, you are permitted to hire a separate attorney if you so choose.

As Class Counsel, Joseph & Kirschenbaum LLP is handling this matter on a contingency basis. In other words, Class Counsel will be paid out of any recovery and will not be paid at all if there is no recovery. If the Class Members prevail on their claims against Defendants, Class Counsel will make an application to the Court for the recovery of fees and legal costs and expenses. Class Counsel may seek attorneys’ fees totaling one-third of any settlement fund or judgment recovered on behalf of the Class as well as reimbursement of their expenses.

TO GET MORE INFORMATION

You can obtain more information about this lawsuit by contacting Class Counsel:

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